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4:06CR080

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

PEGGY SUE CARNES,

Defendant.

) I N D I C T M E N T

) CASE NO.

) JUDGE

) Title 29, Sections 501(c) and 439(c),
) United States Code

4:06CR080
JUDGE BOYKO

COUNT 1

(Labor Union Embezzlement)

The Grand Jury charges:

1. At all times material to this Indictment, the Paper, Allied Industrial, Chemical and Energy Workers Union (PACE), was a labor organization engaged in an industry affecting commerce within the meaning of Title 29, Section 402(i) and (j), United States Code; by virtue of the fact, among others, the union represented employees of a business that affected commerce.

2. At all times material to this Indictment, the defendant, PEGGY SUE CARNES, was an officer, that is, Financial Secretary-Treasurer, of PACE Local 5-621.

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3. From on or about April 3, 2001, through on or about April 12, 2002, in the Northern District, Ohio, Eastern Division, the defendant, PEGGY SUE CARNES, did embezzle, steal and unlawfully abstract and convert to her own use the moneys, funds, securities, property and other assets belonging to PACE Local 5-621 in the approximate amount of \$8,019.73.

All in violation of Title 29, Section 501(c), United States Code.

COUNT 2

(Falsification of Labor Union Records)

The Grand Jury further charges:

1. The allegations contained in paragraphs 1 and 2 of Count 1 are repeated and realleged as if fully set forth herein.

2. From on or about April 3, 2001, through on or about April 12, 2002, in the Northern District of Ohio, Eastern Division, the defendant, PEGGY SUE CARNES, did willfully make false entries in a record required to be kept by Title 29, Section 436, United States Code, that is, a record of union expenditures, a record on matters required to be reported in the annual financial report of PACE Local 5-621, required to be filed with the Secretary of Labor.

All in violation of Title 29, Section 439(c), United States Code.

A TRUE BILL.

Original document -- Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.